



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

December 22, 2021

Transmitted Electronically

Ms. Shari Kolak
Remedial Project Manager
U.S. EPA, Region 5
SR-6J
77 West Jackson Boulevard
Chicago, IL 60604

Re: Troy Well Field Unknown Source
Remediation Response
Project Records
Remedial Response
Miami County
555001353012

Subject: Draft Basis of Design Report for Vapor Intrusion Mitigation Systems – Ohio EPA Review

Dear Ms. Kolak:

On December 3, 2021, the Ohio Environmental Protection Agency (Ohio EPA), Division of Environmental Response and Revitalization (DERR) received the Draft Basis of Design Report for Vapor Intrusion (VI) Mitigation Systems for the East Troy Contaminated Aquifer Site in Troy, Miami County, Ohio. DERR is providing the following review comments for your consideration.

1. Appendix C, Preliminary Cost Estimate. The preliminary cost estimate for operation and maintenance (O&M) of the VI mitigation systems is \$6,370,000. This is significantly higher than the 2018 interim Record of Decision (ROD) cost estimate of \$3,700,650. The higher estimated O&M costs appear to result from an increase in the O&M period from 15 years to 30 years and the addition of \$2,608,965 in electricity costs for operation of the VI mitigation systems for 30 years.


The interim ROD cost estimate assumed the ground water treatment component of the interim remedy would achieve cleanup goals in 10 to 15 years. Therefore, it was assumed that the VI mitigation systems would be operated for up to 15 years and the O&M period was projected at 15 years, accordingly. Ohio EPA believes that the VI mitigation system maintenance period should be reduced back to 15 years to be consistent with the interim ROD, and the remedy with which Ohio EPA concurred. The Draft Basis of Design report provides no explanation for the increased O&M period of 30 years. Please explain the reason for the increase in the O&M period from 15 years to 30 years.

The focused feasibility study and interim ROD did not discuss or include electricity costs for operation of VI mitigation systems. The addition of energy costs for 30 years increases and deviates from the original projected O&M costs for the interim VI remedy by over 70%. The Draft Basis of Design report provides no explanation for the addition of electricity costs and no details on how the costs would be parsed out for individual property owners. Please explain why energy costs are now being included and why VI mitigation systems are being projected to run for 30 years instead of 15 years.

2. Appendix C, Preliminary Cost Estimate, Table C-1. The table lists a 15% contingency of \$139,987 for capital costs but does not include the 15% contingency amount of \$830,921 that was added to the O&M costs in Table C-3. Please check Table C-1 and revise as needed.

If you have any questions, please contact me at (937) 285-6065 or by email at Scott.Glum@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Glum", with a long horizontal line extending to the right.

Scott Glum
Site Coordinator
Division of Environmental Response and Revitalization

SG/rlw

ec: Mark Rickrich, DERR/CO
Gavin Armstrong, DERR/CO